

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

SANDRA J. WHITE

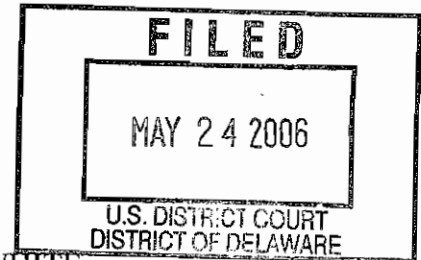
Plaintiff,

v.

DETECTIVE MARZEC, in his  
Official and individual capacity  
AGENT TOM JACOBS, and  
AGENT CHRIS QUAGLINO,

Defendants,

C.A. No. 06-008-KAJ



MEMORANDUM RESPONSE OF SANDRA J. WHITE

*BP scanned*

NOW Comes the plaintiff, Sandra J. White, pro se who so moves the honorable  
Court, with the following responses, and they go as follows;

(1). I do live and reside in the home that was illegally searched and seized,  
on 09-21-05, by the named defendants.

(a). I have lived there for a substantial period of time and do have man  
reasonable expectancy of privacy at the same property.

(2). My arrest , handcuffing and having guns pointed at me, should have  
never happen, because the named defendants, had no search wearrant for the  
premises that they were at.

(a). The search warrant was for Trailer in Ellendale, labeled the Sales/  
Packaging Trailer, and it fit the description of the trailer in the Search warrant  
Totally in (a) color (b) design and (c) location which was Ellendale Delaware.

(3). The actions of defendants was malicious intended without care for  
plaintiff medical condition or rights of plaintiff and should have never happen  
to begin with.

(a). The defendant didn't act in good-faith nor as well trained and  
supervised policemen.

Respectfully, submitted  
*Sandra J. White*  
Sandra J. White

AFFIDAVIT OF Steve Hickman

COUNTY OF SUSSEX )  
)  
STATE OF DELAWARE)

I, Steve Hickman, after being duly SWORN and  
Subscribed, before a Notary Public for the State and County Aforesaid, did depose  
And say the following:

(1). Sandra J. White is my Fiancers mother

(2). I have know her for 13 years.

(3). She resides with me and my kids at 9008 Greentop Rd, Lincoln  
Delaware.

(a). She was living at that residence prior to the illegal search and seizure  
on 09-21-05.

Kathleen E. White  
Signature & Seal of Notary

Steve Hickman  
Signature of affiant

AFFIDAVIT OF Tawanda Weatherspoon

COUNTY OF SUSSEX )

STATE OF DELAWARE)

I, Tawanda Weatherspoon, after being duly SWORN and Subscribed, before a Notary Public for the State and County Aforesaid, did depose And say the following:

(1). Sandra J. White is my Mother

(2). I have know her for Whole life years.

(3). She resides with me and my kids at 9008 Greentop Rd, Lincoln Delaware.

(a). She was living at that residence prior to the illegal search and seizure on 09-21-05.

Ruthless E. Wells  
Signature & Seal of Notary

Tawanda Weatherspoon  
Signature of affiant

CERTTIFICATYE OF SERVICE

I, Sandra J. White, verify service of attached document  
Upon all parties listed below, and do the same with my signature, on this 22 th  
Day of May, 2006, via U>S> Postal Service system.

Respectfully submitted

Sandra J. White  
9008 Green Top Rd  
Lincoln DE  
19960

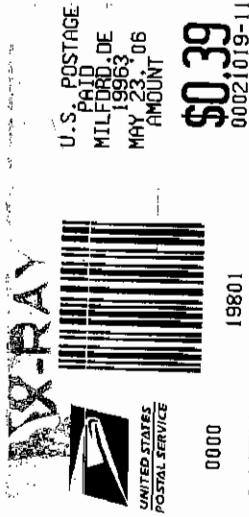
Mr. Seth M. Beausang  
Assistant U>S> Attorney  
1007 Orange St. Suite 700  
Wilmington, DE. 19801

Mr. Daniel A. Griffith  
1220 Market St. 5<sup>th</sup> Floor  
Wilmington, DE. 19801

Steve Hickman  
9008 Green Top Rd  
Lincoln DE 19960

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\_\_\_\_\_

Sandra White  
9008 Greentop Rd  
Lincoln, DE 19960



U.S. District Court

Clerk  
Lockbox 18  
844 King St  
Wilmington, DE

19801